

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INNOVATIVE DISPLAY
TECHNOLOGIES LLC,

Plaintiff,

v.

HYUNDAI MOTOR CO.,

Defendants.

INNOVATIVE DISPLAY
TECHNOLOGIES LLC,

Plaintiff,

v.

TOYOTA MOTOR CORPORATION, ET
AL.,

Defendants.

Civil Action No. 2:14-CV-00201 JRG

LEAD CONSOLIDATED CASE

Honorable Rodney Gilstrap

CASE NO. 2:14-CV-200 JRG

TOYOTA DEFENDANTS' NOTICE OF DISCLOSURES

Defendants Toyota Motor Corporation; Toyota Motor Sales, U.S.A., Inc.; Toyota Motor Manufacturing, Kentucky, Inc.; Toyota Motor Manufacturing, Indiana, Inc.; Toyota Motor Manufacturing, Texas, Inc.; Toyota Motor Manufacturing, Mississippi, Inc.; Subaru Of Indiana Automotive, Inc.; and Gulf States Toyota, Inc. hereby file this Notice of Disclosures pursuant to Rule 16 of the Federal Rules of Civil Procedure and the Court's Discovery Order.

Dated: December 22, 2014

Respectfully submitted,

/s/ David Beck

David Beck, Lead Attorney
Texas Bar No. 00000070
Email: dbeck@beckredden.com

Thomas E. Ganuchea
Texas Bar No. 00784104
Email: tganuchea@beckredden.com

Robert David “B.D.” Daniel
Texas Bar No. 05362200
Email: bddaniel@beckredden.com

Leslie Honey Tronche
Texas Bar No. 24078681
Email: ltronche@beckredden.com

BECK REDDEN LLP
1221 McKinney St., Suite 4500
Houston, TX 77010
Phone: 713.951.6219
Fax: 713.951.3720
www.beckredden.com

Thomas W. Winland (admitted *pro hac vice*)
Email: tom.winland@finnegan.com

James R. Barney (admitted *pro hac vice*)
Email: james.barney@finnegan.com

P. Andrew Riley (admitted *pro hac vice*)
Email: andrew.riley@finnegan.com

**FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP**
901 New York Avenue, NW
Washington, DC 20001-4413
Telephone: (202) 408-4000
Facsimile: (202) 408-4400

*Attorneys for Defendants
Toyota Motor Corporation;
Toyota Motor Sales, U.S.A., Inc.;
Toyota Motor Manufacturing, Kentucky, Inc.;
Toyota Motor Manufacturing, Indiana, Inc.;
Toyota Motor Manufacturing, Texas, Inc.;
Toyota Motor Manufacturing, Mississippi, Inc.;
Subaru Of Indiana Automotive, Inc.;
and Gulf States Toyota, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 22nd day of December, 2014, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission or first class mail on this same date.

/s/ *David Beck*

David Beck